

EXHIBIT “O”

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERIWAY CORPORATION,

Plaintiff,

v.

MAY YAN CHEN,
ABILITY CUSTOMS INC.,

Defendants.

Case No. 19-CV-09407-VSB

**PLAINTIFF AMERIWAY’S OBJECTIONS AND RESPONSES TO DEFENDANTS’
REQUESTS FOR ADMISSION DATED DECEMBER 14, 2021**

Pursuant to Federal Rules of Civil Procedure, Rules 26-37, Plaintiff Ameriway Corporation. (“Ameriway”) provides the following objections and response to Defendants May Yan Chen, Ability Customs Inc. (collective “Chen”) First Set of Request for Admissions (“Requests for Admissions”).

RESERVATION OF RIGHTS

1. Ameriway incorporates by reference each and every general objection set forth below into each specific response. The specific response may repeat a general objection for emphasis or other reason. The failure to include any general objection in any specific response shall not be interpreted as a waiver of any general objection to that response.

2. By responding to Chen’s Requests for Admission, Ameriway does not waive any objections that may be applicable to: (a) the use, for any purpose, by Chen of any information or documents given in response to Chen’s Requests for Admission; or (b) the admissibility, relevancy, or materiality of any of the information or documents to any issue in this case.

3. No incidental or implied admissions are intended by the responses herein. The fact that Ameriway has answered or objected to any discovery request is not, and should not be taken as, an admission that Ameriway accepts or admits the existence of any “fact” set forth or assumed by such discovery request. Nothing in Ameriway’s objections or responses should be taken as any admission or statement regarding the appropriate scope of any claim or construction of any claim term or phrase.

4. Ameriway’s responses to Chen’s Requests for Admission are made to the best of Ameriway’s present knowledge, information, and belief. Ameriway reserves the right to supplement and amend these responses should future investigation indicate that such supplementation or amendment is necessary. Ameriway reserves the right to make any use of, or to introduce at any hearing and/or at trial, information or documents that are responsive to Chen’s Requests for Admission, but discovered subsequent to Ameriway’s service of these responses.

5. By stating that it will provide information in response to any particular discovery request, Ameriway makes no representation that any such information exists.

GENERAL OBJECTIONS

1. Ameriway objects to Chen’s requests the grounds to the extent that the information sought is privileged, cumulative of information that can be obtained through less burdensome means, or calls for legal conclusion and/or expert opinion.

2. Ameriway objects to each and every request for admission to the extent that it purports, through Chen’s instructions, definitions or otherwise, to impose burdens or duties that exceed the scope of reasonable and permissible discovery under the Federal Rules of Civil Procedure.

3. Ameriway objects to the definition of Related Patent as overly broad and unduly

burdensome and seeking information not relevant to claims and defenses in this lawsuit and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Ameriway objects to each request and to the definition of Related Patent to the extent it seeks information related to foreign or international patent applications. Ameriway will produce information related to United States applications only, subject to any and all other objections set forth herein; and Ameriway will also produce, subject to any and all other objections set forth herein, any prior art reference within any file for any international or foreign application.

4. Ameriway objects to each and every request for admission to the extent that it is overbroad, unduly burdensome, oppressive, or constitutes an abuse of process, particularly when the discovery request is unduly burdensome in view of the cost necessary to investigate weighed against Chen's need for the information or document.

5. Ameriway objects to each and every request for admission to the extent that it seeks information or documents protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, protection, or doctrine. The admission of any privileged information or documents by Ameriway is unintentional, and Ameriway does not intend to waive any applicable objection or privilege as a result of such admission.

6. Ameriway objects to each and every request for admission to the extent that it calls for a legal conclusion. Any responses or the admission of documents by Ameriway shall not be construed as providing a legal conclusion regarding the meaning or application of any terms or phrases used in Chen's discovery request.

7. Ameriway objects to each and every request for admission to the extent that it seeks information or documents already in the possession of Chen or in the public domain and that are as readily available to Chen as they are to Ameriway.

8. Ameriway objects to each and every request for admission to the extent that it seeks information or documents beyond Ameriway's possession, custody, or control, or that calls for Ameriway to prepare documents or things that do not currently exist.

9. Ameriway objects to each and every request for admission to the extent that it seeks to impose an obligation to identify or search for documents at any location other than that at which they would be expected to be stored in the ordinary course of business.

10. Ameriway objects to each and every request for admission and deposition topic to the extent that it seeks information or documents that are cumulative or duplicative of information or documents already provided by Ameriway.

11. Ameriway objects to each and every request for admission as overbroad and unduly burdensome to the extent that it is unlimited in temporal scope or otherwise not limited to a time frame relevant to this litigation.

12. Ameriway objects to each and every request for admission to the extent that it seeks documents or information that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

13. Ameriway objects to each and every request for admission to the extent that it seeks confidential technical, trade secret, or business information. Ameriway will only produce such information subject to the Protective Order agreed to by the parties, or subject to additional adequate protections as may be required by the circumstances.

14. Ameriway objects to each and every request for admission to the extent that it seeks information or documents that Ameriway is ordered by a competent court not to disclose, or that are subject to confidentiality obligations or agreements with third parties.

15. Ameriway objects to each and every request for admission to the extent that it is

vague and ambiguous or uses terms that are vaguely or ambiguously defined, and therefore fail to identify with reasonable particularity the information sought. Ameriway will not speculate as to the meaning to ascribe to such terms.

16. Ameriway objects to each and every request for admission to the extent that it is duplicative of any other discovery request.

17. Ameriway objects to each and every request for admission to the extent that it lacks foundation or assumes facts that are incorrect or unknown to Ameriway.

18. Ameriway objects to each and every request for admission to the extent that it seeks discovery of material within the scope of Federal Rules of Civil Procedure 26(b)(4), and therefore constitutes an improper and premature attempt to conduct discovery of expert opinion.

19. Ameriway objects to each and every request for admission to the extent that it purports to attribute any special or unusual meaning to any technical terms or phrases.

20. Ameriway objects to each and every request for admission, and to the accompanying definitions and instructions, to the extent that they purport to alter the plain meaning and/or scope of any specific request and thereby render such request vague, ambiguous, overly broad, and uncertain.

SPECIFIC OBJECTIONS TO REQUESTS FOR ADMISSION

RESPONSE TO REQUEST NUMBER 1:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway specifically objects to this Request on the grounds that it is vague and ambiguous and fails to identify with reasonable particularity the information sought. Ameriway specifically objects to this Request as being overly broad and unduly burdensome and seeking information not relevant to claims and defenses in this lawsuit and not reasonably calculated to lead to the

discovery of admissible evidence. Ameriway specifically objects to this Request to the extent it seeks information protected from discovery by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or immunity. Ameriway specifically objects to this Request on the grounds that it seeks confidential technical, trade secret, or business information. Ameriway objects this Request to the extent that it seeks information or documents that Ameriway is ordered by a competent court not to disclose, pursuant to confidentiality obligations or agreements with third parties. Ameriway objects to this Request the grounds that it seeks information or documents beyond Ameriway's possession, custody, or control, or that calls for Ameriway to prepare documents or things that do not currently exist. Ameriway objects to this Request on the grounds that it seeks information or documents already in the possession of Chen or in the public domain or that are as readily available to Chen as they are to Ameriway. Ameriway objects to this Request to the extent that the discovery sought is unreasonably cumulative or duplicative, or can be obtained from some other source that is more convenient, less burdensome, or less expensive. Ameriway objects to this Request the grounds that it seeks information or documents that is unnecessarily oppressive and calculated to annoy and harass Ameriway. Ameriway objects to this Request to the extent that it seeks information beyond Ameriway's possession, custody, or control, and such information is not reasonably available to Ameriway.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 2:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent the referenced Exhibit “B” is an entry summary.

RESPONSE TO REQUEST NUMBER 3:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied, the referenced document is incomplete.

RESPONSE TO REQUEST NUMBER 4:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent the document corresponds to the contents of the container.

RESPONSE TO REQUEST NUMBER 5:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Plaintiff is without knowledge to answer after reasonable inquiry.

RESPONSE TO REQUEST NUMBER 6:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 7:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent the document may correspond to the content of the container.

RESPONSE TO REQUEST NUMBER 8:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 9:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that Exhibit “I” is an entry summary.

RESPONSE TO REQUEST NUMBER 10:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied, the referenced document is incomplete.

RESPONSE TO REQUEST NUMBER 11:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent the document corresponds to the contents of the container.

RESPONSE TO REQUEST NUMBER 12:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Plaintiff is without knowledge to answer after reasonable inquiry.

RESPONSE TO REQUEST NUMBER 13:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 14:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent the document may correspond to the content of the container.

RESPONSE TO REQUEST NUMBER 15:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth

herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 16:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that Exhibit “P” is an entry summary.

RESPONSE TO REQUEST NUMBER 17:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied, the referenced document is incomplete.

RESPONSE TO REQUEST NUMBER 18:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this

Request, Ameriway responds as follows:

Admit to the extent the document corresponds to the contents of the container.

RESPONSE TO REQUEST NUMBER 19:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Plaintiff is without knowledge to answer after reasonable inquiry.

RESPONSE TO REQUEST NUMBER 20:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 21:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent the document may correspond to the content of the container.

RESPONSE TO REQUEST NUMBER 22:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 23:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that the Exhibit is an entry summary.

RESPONSE TO REQUEST NUMBER 24:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied, the referenced document is incomplete.

RESPONSE TO REQUEST NUMBER 25:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent the document corresponds to the content of the container.

RESPONSE TO REQUEST NUMBER 26:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Plaintiff is without knowledge to answer after reasonable inquiry.

RESPONSE TO REQUEST NUMBER 27:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 28:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 29:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that the Exhibit is an entry summary.

RESPONSE TO REQUEST NUMBER 30:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied, the referenced document is incomplete.

RESPONSE TO REQUEST NUMBER 31:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent the document may correspond to the contents of the container.

RESPONSE TO REQUEST NUMBER 32:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Plaintiff is without knowledge to answer after reasonable inquiry.

RESPONSE TO REQUEST NUMBER 33:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 34:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent the referenced document may correspond to the content of the container.

RESPONSE TO REQUEST NUMBER 35:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 36:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 37:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 38:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 39:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 40:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 41:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 42:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 43:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied

RESPONSE TO REQUEST NUMBER 44:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 45:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 46:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 47:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 48:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 49:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 50:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 51:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth

herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 52:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 53:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent Ameriway made payments to Chen.

RESPONSE TO REQUEST NUMBER 54:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this

Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 55:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 56:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 57:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 58:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 59:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 60:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent the shares are documented.

RESPONSE TO REQUEST NUMBER 61:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 62:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 63:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 64:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 65:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 66:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 67:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 68:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 69:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent the documents required by the bank were provided.

RESPONSE TO REQUEST NUMBER 70:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 71:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit, to the extent Eagle made payments to Ameriway.

RESPONSE TO REQUEST NUMBER 72:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 73:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 74:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth

herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 75:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that Ameriway has proper legal status to perform the service it renders.

RESPONSE TO REQUEST NUMBER 76:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that Ameriway has proper legal status to perform the service it renders.

RESPONSE TO REQUEST NUMBER 77:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth

herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 78:

Ameriway incorporates its General Objections above as if fully set forth herein.
Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that Ameriway has proper legal status to perform the service it renders.

RESPONSE TO REQUEST NUMBER 79:

Ameriway incorporates its General Objections above as if fully set forth herein.
Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 80:

Ameriway incorporates its General Objections above as if fully set forth herein.
Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that at least Xiyan Zhang is currently acting as Ameriway's CEO.

RESPONSE TO REQUEST NUMBER 81:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 82:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 83:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this

Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 84:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 85:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein. This request is vague and calls for either crucial facts central to the lawsuit or a legal conclusion.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 86:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 87:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein. This request is vague and calls for either crucial facts central to the lawsuit or a legal conclusion.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 88:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 89:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 90:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 91:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein. This request is vague and calls for either crucial facts central to the lawsuit or a legal conclusion.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 92:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein. This request is vague and calls for either crucial facts central to the lawsuit or a legal conclusion.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 93:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 94:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein. This request is vague and calls for either crucial facts central to the lawsuit or a legal conclusion.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 95:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 96:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth

herein. This request is vague and calls for either crucial facts central to the lawsuit or a legal conclusion.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 97:

Ameriway incorporates its General Objections above as if fully set forth herein.
Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 98:

Ameriway incorporates its General Objections above as if fully set forth herein.
Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 99:

Ameriway incorporates its General Objections above as if fully set forth herein.
Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 100:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 101:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 102:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 103:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 104:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 105:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 106:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 107:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 108:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 109:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth

herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 110:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 111:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 112:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this

Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 113:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 114:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 115:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 116:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 117:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 118:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 119: Omitted by Defendants.

RESPONSE TO REQUEST NUMBER 120:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 121:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 122:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 123:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 124:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 125:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 126:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 127:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 128:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 129:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 130:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 131:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 132:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 134:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 135:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 136:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 137:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth

herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 138:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 139:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 140:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this

Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 141:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 142:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 143:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 144:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 145:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 146:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 147:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 148:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 149:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 150:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 151:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 152:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 153:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 154:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 155:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 156:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 157:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 158:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 159:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 160:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth

herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 161:

Ameriway incorporates its General Objections above as if fully set forth herein.
Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 162:

Ameriway incorporates its General Objections above as if fully set forth herein.
Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 163:

Ameriway incorporates its General Objections above as if fully set forth herein.
Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this

Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 164:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 165:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit

RESPONSE TO REQUEST NUMBER 166:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 167:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 168:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 170:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 171:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 172:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 173:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 174:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 175:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 176:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 177:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 178:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 179:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 180:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 181:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 182:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 183:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 184:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth

herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 185:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 186:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 187:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this

Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 188:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 189:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 190:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 191:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 192:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 193:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 194:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 195:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 196:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 197:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 198:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 199:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 200:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 201:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 202:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 203:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 204:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 205:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 206:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit only to the extent that Zhang's signature appears on the first page of the document.

RESPONSE TO REQUEST NUMBER 207:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 208:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 209:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 210:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Privileged, and cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 211:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Privileged.

RESPONSE TO REQUEST NUMBER 212:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied,

RESPONSE TO REQUEST NUMBER 213:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 214:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 215:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 216:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 217:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 218:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 219:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 220:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth

herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 221:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 222:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 223:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this

Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 224:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 225:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 226:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 227:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 228:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 229:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 230:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 231:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 232:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 233:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 234:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 235:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 236:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 237:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that no payment has been made specifically relating to Container A as the Container was stolen by Chen.

RESPONSE TO REQUEST NUMBER 238:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that no payment has been made specifically relating to Container B as the Container was stolen by Chen.

RESPONSE TO REQUEST NUMBER 239:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that no payment has been made specifically relating to Container C as the Container was stolen by Chen.

RESPONSE TO REQUEST NUMBER 240:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that no payment has been made specifically relating to Container D as the Container was stolen by Chen.

RESPONSE TO REQUEST NUMBER 241:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit to the extent that no payment has been made specifically relating to Container E as the Container was stolen by Chen.

RESPONSE TO REQUEST NUMBER 242:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this

Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 243:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 244:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 245:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 246:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 247:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 248:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 249:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 250:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 251:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 252:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 253:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 254:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 255:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 256:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 257:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 258:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 259:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 260:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 261:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 262:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth

herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 263:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 264:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 265:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this

Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 266:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 267:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 268:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 269:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 270:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 271:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 272:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 273:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 274:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 275:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 276:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 277:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 278:

Ameriway incorporates its General Objections above as if fully set forth herein. Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 279:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 280:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 281:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Admit.

RESPONSE TO REQUEST NUMBER 282:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 283:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 284:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 285:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth

herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 286:

Ameriway incorporates its General Objections above as if fully set forth herein.
Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 287:

Ameriway incorporates its General Objections above as if fully set forth herein.
Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 288:

Ameriway incorporates its General Objections above as if fully set forth herein.
Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this

Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 289:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 290:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 291:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER [286-289]: WRONG NUMBERING

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Cannot testify on behalf of third party.

RESPONSE TO REQUEST NUMBER 290:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 291:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 292:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 293:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

RESPONSE TO REQUEST NUMBER 294:

Ameriway incorporates its General Objections above as if fully set forth herein.

Ameriway incorporates all its Specific Objections in its Response to Request Number 2 set forth herein.

Subject to the foregoing objections and to the extent Ameriway can understand this Request, Ameriway responds as follows:

Denied.

Dated: January 13, 2022

s/Pete Wolfgram
Pete Wolfgram
Stratum Law LLC
2424 E. York St. Ste. 223
pwolfgram@stratumlaw.com

Attorneys for Plaintiff
Ameriway Corporation

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2022, I caused to be served a copy of the foregoing on counsel of record for Chen, via email:

William Shayne wshayne@shaynelawgroup.com

Richard Schrier resincourt@aol.com

Audrey Drillich adrillich@shaynelawgroup.com

s/ Xiyan Zhang
Xiyan Zhang